REMARKS

The present Amendment is submitted with a Request for Continued Examination. Upon entry of the present Amendment, claims 1-16 are all the claims pending in the application. Claims 1, 3, 5, 7 and 9 are amended, and new claims 10-16 are added. No new matter is presented.

Claims 1, 3, 5, 7 and 9 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Bhatia et al. (U.S. Patent No. 6,829,239, hereinafter "Bhatia"). Further, claims 2 and 6 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Bhatia in view of Wootten et al. (U.S. Patent No. 6,128,298, hereinafter "Wootten"), and claims 4 and 8 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Bhatia in view of Chitturi (U.S. Patent No. 6,760,780). The outstanding rejections are addressed as follows.

Claim Rejections - 35 U.S.C. § 102

As noted above, claims 1, 3, 5, 7 and 9 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Bhatia. This ground of rejection is traversed.

Claim 1 defines a network address conversion system for enabling an access to a node of a private network, having a private IP address and an internal port value. Applicant submits that Bhatia fails to teach or suggest *at least* the features of an external port value allocation unit which allocates a first external port value to the specific node *in response to receiving the access reservation demand from the external node*, and transmitting the first external port value to the

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external network node; and *a mapping table which records a mapping relationship between the first external port value that is allocated and the internal port value of the specific node of the private network.*

In this regard, Applicant notes that Bhatia merely teaches a LAN (local area network) modem which performs network address translation of private IP addresses and port numbers to public IP address and port numbers in response to packets transmitted *from a local workstation to a remote server.* As taught by Bhatia, the LAN modem receives a packet from a local workstation and compares a private source port number of the packet with public source port numbers which are stored in the network address translation table. Further, if the private source port number of the packet from the local workstation has been previously assigned by the LAN modem to another local workstation, Bhatia teaches that the LAN modem assigns a new public source port number and a public IP address to the packet. The LAN modem *then stores* the private source port number together with the newly assigned public port number in the network address translation table. Subsequently, the modified packet is transmitted to a remote server (i.e., the destination address). *See* Bhatia at col. 16, lines 15-55.

Conversely, claim 1 requires that the first external port value is allocated to the specific node of the private network in response to receiving the access reservation demand from the external node. Further, claim 1 requires that mapping table records a mapping relationship between the allocated first external port value and the internal port value. Bhatia, as shown above, assigns a public source port number to an internal node in response to an outbound packet from the internal node itself. This distinction is clearly shown in col. 13, line 43 - col. 14, line 49

and Table 1 of Bhatia, which describes the assignment of a public port number corresponding to the private port number of the workstation located on the internal network in response to a packet received at the LAN modem *from the internal workstation* that is addressed to a remote server.

Thus, the external port value of Bhatia is not allocated in response to an access reservation demand received from an external node, as required by claim 1. Accordingly, reconsideration and withdrawal of the rejection is requested. Further, claims 5 and 9, which define a network address conversion method and a recording medium for recording a network address conversion method, respectively recite similar features as discussed above with respect to claim 1 and should therefore be allowable for at least the same reasons.

In addition, applicant submits that claims 2-4, 6-8 and 10-16 are allowable *at least* by virtue of respectively depending from claims 1, 5 and 9. Accordingly, allowance of claims 1-16 is requested.

Claim Rejections - 35 U.S.C. § 103

With respect to the rejection of claims 2 and 6 under 35 U.S.C. § 103(a) based on Bhatia in view of Wootton, Applicant submits that these claims are allowable at least by virtue of their respective dependency from independent claims 1 and 5. Therefore, allowance of claims 2 and 6 is requested.

Further, with respect to the rejection of claims 4 and 8 under 35 U.S.C. § 103(a) based on Bhatia in view of Chitturi, Applicant submits that these claims are allowable at least by virtue of

their respective dependency from independent claims 1 and 5. Therefore, allowance of claims 4 and 8 is requested.

New claims

In order to prove additional claim coverage merited by the scope of the invention, Applicant is adding new claims 10-16. As discussed above, these claims are believed to be allowable at least by virtue of their respective dependency. Further, Applicant submits that the cited references do not teach or suggest the novel features which are recited in new claims 10-16.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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The USPTO is directed and authorized to charge all required fees, except for the Issue

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Respectfully submitted,

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Brian K. Shelton
Registration No. 50,245

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